

III. REMARKS

In the present invention the identification of the keypad is not "transmitted by user interaction" FROM the keypad to the device but rather detected BY the device based on the properties of the keypad (resistance value).

In Parker the concept is based on a key matrix, for which the mode can be changed by actively selecting which mode is active. The possible key positions are predefined and another aspect that makes them not applicable for 'modern' mobile phone application is that this implementation would result in unnecessary components (see elements of claim 1), depending on design, being part of the device, which is not feasible in todays market due to manufacturing cost pressure.

The present invention solves these problems by minimizing the number of connector pins needed, allowing key layout design (position of keys) freedom without any non-functional components.

Further, the cited col. 4, lines 52-65, of Parker, discloses sending a keypad identification signal. Nothing is said about resistance values.

Thus the rejection of claims 1-3, 5 and 21-24 under 35 U.S.C. 102 on Parker, which claims now recite the resistance concept not found in Parker, should be withdrawn.

Further, since this resistance feature is not suggested by Parker, these claims are unobvious over it.

Hyun also fails to disclose this. Also Hyun is far more complex and costly than the present invention. In particular, it has moving mechanisms and electronics including speakers and the keypad modules have their own circuitry. The circuitry in the present invention, which is based on a foil structure, is in the housing, and thus the present invention is a simple and low cost solution.

Further, Hyun is not a valid reference since its filing date of March 19, 2002 is after the filing date of the present invention, October 24, 2001. Please note that it is not entitled to its Korean filing date for references purposes, see MPEP 706.02(f), example 3, In re Hilmer 149 USPQ 480.

Thus the rejection of claims 4, 7-13 and 15-20 under 35 USC 103 on Parker in view of Hyun should be withdrawn.

Similarly, Birstead fails to show the resistance concept. Hence combining it with Parker does not result in the present invention. Thus the rejection of claim 6 should be withdrawn.

Also, Fellegara fails to show this concept. Hence combining it with Parker does not result in the present invention. Thus the rejection of claim 14 should be withdrawn.

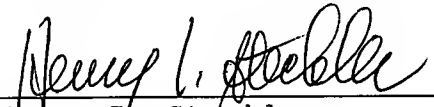
New claims 25-32 are directed to the keypad itself. Since they recite resistance concept, which, as explained above, it not found in or suggested by the references, they are patentable.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should

any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$400.00 is enclosed for additional claims fees. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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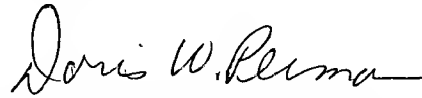
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